

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SAMUEL TROICE,  
HORACIO MENDEZ,  
ANNALISA MENDEZ,  
PUNGA PUNGA FINANCIAL, LTD.  
individually and on behalf of a class  
of all others similarly situated,

Plaintiffs,

-against-

PROSKAUER ROSE LLP,  
THOMAS V. SJOBLOM,  
P. MAURICIO ALVARADO, and  
CHADBOURNE & PARKE LLP,

Defendants.

CIVIL ACTION NO. 3:09-cv-01600-F

**DEFENDANT THOMAS V. SJOBLOM'S SUGGESTION OF BANKRUPTCY**

Thomas V. Sjoblom, a Defendant in the above-captioned lawsuit, by and through counsel, files this Suggestion of Bankruptcy suggesting to the Court that all further action against him in this case be stayed, and in support thereof, would show as follows:

1. On May 31, 2014, Defendant Thomas V. Sjoblom filed a Voluntary Chapter 13 Petition in the United States Bankruptcy Court for the District of Columbia, which was docketed as Case No. 14-00329. That case is still pending before the Bankruptcy Court.

2. The claim against the Defendant on which this lawsuit is based is included in the Debtor's bankruptcy and due notice thereof has been furnished to the Plaintiffs.

3. The filing of the Debtor's bankruptcy triggers the automatic stay of Section 362 of the Bankruptcy Code, which provides, in pertinent part, that:

[A] petition filed under section 301, 302 or 303 of this title [11 U.S.C.] ... operates as a stay, applicable to all entities, of –

(1) the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the Debtor that arose before the commencement of the case under this title ....

11 U.S.C. ' 362(a)(1).

WHEREFORE, it is suggested that this Court, in accordance with the provisions of Section 362 of the Bankruptcy Code, stay all further proceedings and actions of the Plaintiffs against the Defendant Thomas V. Sjoblom.

Dated: August 20, 2014

Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ William B. Mateja  
William B. Mateja  
Texas Bar No. 13185350  
mateja@fr.com  
1717 Main Street, Suite 5000  
Dallas, TX 75201  
Telephone: (214) 747-5070  
Facsimile: (214) 747-2091

*Attorney for Defendant Thomas V. Sjoblom*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2014 the foregoing document was filed electronically with the ECF system and, in accordance with Local Rule 5.1(d), a notice of electronic filing was transmitted to all counsel of record.

/s/ William B. Mateja  
William B. Mateja